

Application Number 10/815,367

Response to Office Action mailed October 26, 2005

### **REMARKS**

This paper is responsive to the Office Action dated October 26, 2005. Applicant has not amended any of the claims. Claims 1-20 remain pending.

### **Prior Art**

Applicant reserves the right to challenge the prior art status of Liu et al. (US 6,751,694) (hereafter Liu) or to demonstrate prior invention. However, given the differences between Liu and Applicant's claims addressed below, the prior art status of Liu (or any need to swear behind the filing date of Liu) should be moot.

### **Claim Rejections**

In the Office Action, the Examiner rejected claims 1-2, 6, and 8-20 under 35 U.S.C. 102(e) as being anticipated by Liu, and rejected claims 3-5 and 8-9 under 35 U.S.C. 103(a) as being unpatentable over Liu in view of Harase (US 5,155,663).

Applicant respectfully traverses these rejections, and respectively submits that neither Liu nor Harase discloses or suggests the requirements of Applicant's claims. Specifically, neither Liu nor Harase discloses or suggests any apparatus that includes a slot having outer regions that extend a central region of the slot to width sufficient to receive *two* different types of memory cards.

In Liu, for example, the insertion cassette 30 does not define a single region that defines a width capable of receiving two different types of memory cards. To be sure, Liu specifically states that engaging area 31 of insertion cassette 30 has at least four different grooves 32 of different lengths and widths to respectively guide four different kinds of memory cards. See column 4, lines 27-36. In other words, each of four grooves 32 extends the slot in Liu to a different width, and each of the different widths are capable of receiving a single, different type of memory card.

In contrast to Liu, Applicant's pending claims specifically define a slot having outer regions that define a width capable of receiving two different types of memory cards. As one example, Applicant's refer the Examiner to FIG. 10 of Applicant's disclosure, reproduced below:

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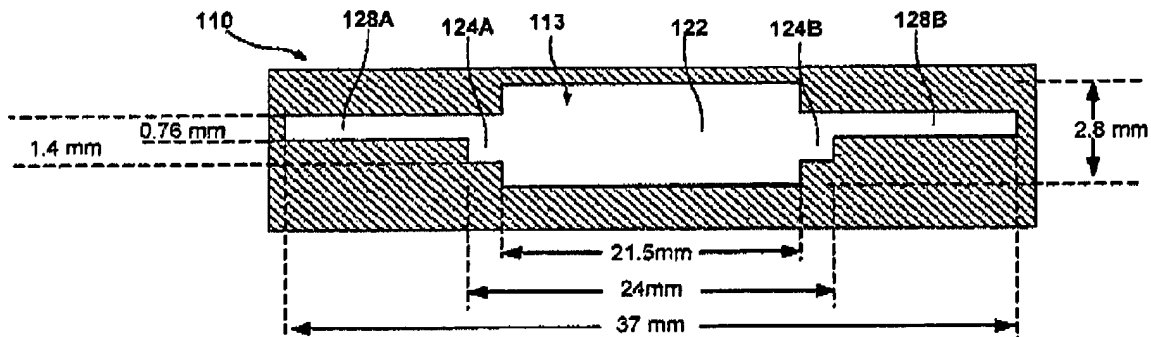


FIG. 10

As described in the present application, in the example illustrated in FIG. 10, slot 113 is formed to receive at least four different types of memory cards, and includes at least one region capable of receiving two of these different types of memory cards. Specifically, slot 113 includes first outer regions 124A and 124B that define heights and widths to receive two different types of memory cards, i.e., Secure Digital memory card 8C and MultiMedia memory card 8D. The width is defined by the extension of the first outer regions 124A and 124B to the central region 122.

Moreover, various dependent claims (e.g., claims 4-5) require a biasing mechanism specifically within the region that receives the two different types of memory cards to bias the memory cards toward a first side of the central region of the slot (claim 4), and to move the specific memory card a distance of at least approximately 3.5 mm from a second side of the central region of the slot (claim 5). These features are clearly lacking from Liu and Harase.

Independent claim 1 recites an apparatus comprising a housing defining a slot to receive one of at least four different types of removable memory cards. Claim 1 requires the slot to include a central region having a width to receive a memory card of a first type, first outer regions that extend the width of the central region to a second width to receive a memory card selected from a second type of memory card and a third type of memory card, and second outer regions that extend the width of the central region to a third width to receive a memory card of a fourth type, and a plurality of electrically conductive contact areas to provide electrical contact with the four different types of memory cards.

In the Office Action, the Examiner stated that Liu anticipates these features of

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Applicant's claim 1. Applicant respectfully disagrees. Specifically, the insertion cassette of Liu does not define a first outer region that extends the width of the central region to a second width to receive a memory card selected from a second type of memory card and a third type of memory card. Indeed, the insertion cassette of Liu does not define any region that receives two different types of memory cards. Instead, the insertion cassette of Liu specifically defines *four* different guide grooves 32, and each of the grooves define a different outer region having a different width to receive respective different types of memory cards. For this reason, the rejection of claim 1 must be withdrawn.

Claim 17 recites apparatus comprising a plurality of electrically conductive contact areas disposed within a cavity to provide electrical contact with at least four different types of removable memory cards. In claim 17, the cavity includes a central region having a width to receive a Memory Stick removable memory card, first outer regions that extend the width of the central region to a second width to receive a MultiMedia removable memory card or a Secure Digital removable memory card, and second outer regions that extend the width of the central region to a third width to receive a Smart Media removable memory card.

As noted above, the insertion cassette of Liu does not define a first outer region that extends the width of the central region to a second width to receive two different types of memory cards. Thus, Liu clearly lacks any suggestion of a slot having outer regions that extend the slot to a single width capable of receiving either a MultiMedia removable memory card or a Secure Digital removable memory card. Instead, the insertion cassette in Liu specifically defines different guide grooves 32 for a MultiMedia card or a Secure Digital card. For this reason, the rejection of claim 17 is also improper.

Claim 18 recites a system comprising an adapter having a slot to receive one of at least four different types of removable memory cards, wherein the slot includes a central region having a width to receive a memory card of a first type, first outer regions that increase the width of the central region to a second width to receive a memory card selected from a second type of memory card or a third type of memory card, and second outer regions that increase the width of the central region to a third width to receive a memory card of a fourth type; and a computing device having a port to receive the adapter.

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Claim 18 distinguishes Liu for at least the reasons advanced above with respect to claim 1 insofar as Liu does not define any region that receives two different types of memory cards. In addition, claim 18 further distinguish Liu for another reason. Specifically, Liu lacks any suggestion of "an adaptor" that includes the requirements of this claim. In Liu, an insertion cassette 30 facilitates acceptance of different memory cards into slot 21. To the extent that insertion cassette 30 may be viewed as an adaptor, however, it does not define a slot, but assumes an open "U-shape."

The Examiner's interpretation of Liu relative to Applicant's claims seems to be premised on an assumption that insertion cassette 30 could be positioned within slot 21 to define a more complex slot, which defines different regions. Applicant disagrees with this interpretation of Liu, and respectively submits that the teaching of Liu seems to imply that the insertion cassette 30 receives a respective memory card prior to insertion into slot 21. In this sense, it is unclear whether Liu actually discloses any "slot" having different regions, insofar as slot 21 of Liu does not define different regions.

Furthermore, with respect to claim 18, nothing in Liu discloses or suggests any "adaptor" that defines a slot. Specifically the card reading functionality in Liu is not within any adaptor, but is specifically defined within mainframe computer 10 without the use of an adaptor. Moreover, to the extent that insertion cassette 30 may be construed as an adaptor, it lacks any slots whatsoever. For these additional reasons, claim 18 should be allowed.

Claim 20 recites an apparatus comprising a housing defining a slot with a plurality of differently sized regions to receive at least four different types of memory cards, wherein the plurality of differently sized regions of the slot includes a first region having a first width to receive a memory card of a first type, a second region having a second width greater than the first width, the second width being sized to receive a memory card selected from a second type of memory card and a third type of memory card, and a third region having a third width greater than the first width and greater than the second width, the third width being sized to receive a memory card of a fourth type. Claim 20 also requires a plurality of electrically conductive contact areas to provide electrical contact with the four different types of memory cards. Claim 20 clearly distinguishes Liu for at least the reasons advanced with respect to claims 1 and 18.

With respect to dependent claims 3-5, Applicant further disputes the Examiner's reliance

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on the teaching of Harase. These claims recite different bias mechanisms that specifically bias memory cards in ways not shown or suggested by Harase. To the extent that Harase may show bias mechanisms for memory cartridges, the bias mechanisms of Harase simply engage preformed recesses of the memory cartridges. In this sense, the mechanisms of Harase simply guide the memory cartridge along a channel.

Nothing in Harase suggests a bias mechanism coupled to the housing to bias a memory card toward the contact areas. Indeed, the Examiner's interpretation of Liu would require the contact areas of Liu to be disposed within slot 20 with respect to a major surface of the memory cards. Unfortunately, the elements of Harase that the Examiner relied upon as being a bias mechanism would bias the cartridges simply to guide them laterally along a channel, and would not bias the surface of cartridges in any direction, much less toward contact areas.

Furthermore, with respect to claim 5, it is entirely unclear how or why the Examiner can interpret the teaching of Harase as disclosing a bias mechanism that moves the memory card a distance of at least approximately 3.5 mm from a second side of the central region of the slot. The elements of Harase that the Examiner relied upon as being a bias mechanism would not appear to move the cartridges at all, much less 3.5 mm from a second side of the central region of the slot. Instead, the elements of Harase that the Examiner relied upon as being a bias mechanism simply guide the memory cartridges of Harase along a channel.

As yet another distinction between Applicant's pending claims and the applied references, Applicant again notes that Liu is different from Applicant's claimed inventions insofar as Liu makes use of an insertion cassette rather than a multi-region slot. Liu specifically defines its slot as element 21, which does not include multiple regions. In practice, a user of the Liu device would place a memory card into the insertion cassette 30, and then insert the cassette 30 (with the memory card) into slot 21. In contrast to this teaching of Liu, Applicant's claims specifically define the slot to receive one of at least four different types of removable memory cards.

In other words, insertion cassette 30 of Liu is not a slot, and nothing in Liu teaches the insertion of cassette 30 into slot 21 prior to insertion of a memory card. In this sense, Liu actually lacks any teaching of a slot to receive one of at least four different types of removable memory cards insofar as cassette 30 does not define a slot, and cassette 30 is designed to receive the memory card prior to insertion into slot 21 of Liu.

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Furthermore, Liu is completely silent with respect to a plurality of electrically conductive contact areas to provide electrical contact with the four different types of memory cards. This feature is recited in claims 1, 17 and 20.

The Examiner seemed to imply that a plurality of electrically conductive contact areas is an inherent feature of Liu, even though Liu lacks any teaching thereof. Liu simply mentions an electric circuit board within mainframe system 10, which can transmit signals from an inserted memory card. However, Liu lacks any details about this "circuit board" and never teaches or suggests that the circuit board includes a plurality of electrically conductive contact areas to provide electrical contact with the four different types of memory cards. Thus, Liu appears to lack any teaching that would have enabled a person of ordinary skill in the art to realize (or even recognize the need for) different electrically conductive contact areas to provide electrical contact with the four different types of memory cards.

### CONCLUSION

In view of the distinctions identified above, Applicant believes that all claims in this application are in condition for immediate allowance. Applicant respectfully requests reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 09-0069. Examiner is invited to telephone the below-signed attorney to discuss this application.

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1/25/06

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